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7 Attorney for JACOB ALEXANDER WOODS

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JACOB ALEXANDER WOODS,

15 Defendant.

Case No. 3:19-CR-00019-MMD-CBC

**STIPULATION TO EXTEND TIME
TO FILE RESPONSE TO MOTION
TO SUPPRESS [ECF #21].**

(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A.
18 TRUTANICH, United States Attorney, and MEGAN RACHOW, Assistant United States
19 Attorney, counsel for the United States of America, and RENE L. VALLADARES, Federal
20 Public Defender, and CHRISTOPHER P. FREY, Assistant Federal Public Defender, counsel
21 for JACOB ALEXANDER WOODS, to extend the time in which the Government's Response
22 to the Defendant's Motion to Suppress [ECF #21] from June 5, 2019, to June 15, 2019. This
23 is the first request for an extension for time to file response. Trial is currently set for July 16,
24 2019.

25 The counsel for the Government will be out of the country until June 1, 2019.
26 Therefore, defense counsel is respectfully requesting additional time for the response to be

1 filed. The additional time requested for the filing the responses is requested mindful of the
2 current trial date of July 16, 2019, the exercise of due diligence, in the interests of justice, and
3 not for any purpose of delay.
4

5 DATED this 24th day of May, 2019.
6

7 RENE L. VALLADARES
8 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

9 /s/ CHRISTOPHER P. FREY
10 By: _____

/s/ MEGAN RACHOW
By: _____

11 CHRISTOPHER P. FREY
12 Assistant Federal Public Defender
13 Counsel for JACOB ALEXANDER WOODS

MEGAN RACHOW
Assistant United States Attorney
Counsel for the Government

14 **IT IS SO ORDERED.**

15 **DATED** this 28th day of May, 2019.
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18 MIRANDA M. DU
19 UNITED STATES DISTRICT JUDGE
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